

**IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI**

STATE OF MISSOURI,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 4:21-cr-00272
)	
DAVID BARKLAGE,)	
)	
Defendant.)	

**DEFENDANT’S SECOND MOTION FOR DEFENDANT TO TRAVEL OUTSIDE OF
THE EASTERN DISTRICT**

COMES NOW Defendant, by and through Counsel, Dee Wampler, Joseph S. Passanise and Taylon M. Sumners, of the WAMPLER & PASSANISE LAW OFFICE and moves this Court to allow Defendant to travel outside of the Eastern District of Missouri. In support of this Motion, Counsel states the following:

1. On May 7, 2021 Defendant entered a Plea of Not Guilty.
2. This Court set forth bond conditions preventing Defendant from traveling outside of the Eastern District of Missouri.
3. Defendant requests to travel outside of the Eastern District to the Western District for work purposes and to travel to his attorney’s office.
4. Defendant understands that he will be required to notify his probation officer of any travel if this Court so grants this motion.
5. Pretrial Services has no objection to this request.

WHEREFORE, Defendant prays for an Order allowing Defendant to travel outside of the Eastern District, and for such other and further relief as the Court deems just and proper.

RESPECTFULLY SUBMITTED,

/s/Joseph S. Passanise

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Certificate of Service

I hereby certify that on June 7, 2021, I electronically filed the foregoing with the U.S. District Court Clerk for the Eastern District of Missouri using the CM/ECF system which sent notification of such filing to U.S. Attorney, St. Louis, Missouri.

/s/Joseph Passanise

Dee Wampler

Joseph S. Passanise

Taylon Sumners

Attorneys at Law